

Message

From: Ian Callan [Ian.Callan@innospecinc.com]
Sent: 2/21/2020 9:52:10 AM
To: Yang, Chun-Chieh [Yang.Chun-Chieh@epa.gov]; Edelstein, Rebecca [Edelstein.Rebecca@epa.gov]
CC: Ian Callan [Ian.Callan@innospecinc.com]
Subject: RE: [External] LVE L-19-0182

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Chun/ Rebecca

This LVE is becoming absolutely senseless!!! We are being asked for data that is not needed and/ or possible

Innospec have provided

- 1) NPDES numbers for High Point POTW (manufacturing wastewater release point after on site GAC filtration) – there are absolute minimal amounts released....if any at all, as specified in the exposure doc)
- 2) Numbers for south coast who blend the LVE substance into a further product - zero release of the LVE substance, as drums are recycled.

We've now been asked for NPDES for other sites down the processing chain where the subsequent product is further blended into ethanol and then into gasoline. How can we possibly provide the detail for unknown/unspecified customers? We feel that this is complete overkill to request this level of detail??

We also provided generic qualitative info and drum/tank residuals for these sites in the exposure/risk assessment report based on the same information taken from full PMN, (not an LVE) applications for some of our other fuel additives past submissions. These data in the PMNs were accepted!

Concentrations of the LVE substance in drums/tanks at the final processing stage is ppm/sub-ppm level compared to the other hazardous/toxic substances in the product, for example form Benzene, Toluene, and Xylene in from gasoline.

The LVE substance is not even hazardous, and based on our read-across and QSAR assessment, there are [REDACTED].

The requests are now not really making any scientific sense at all and we are becoming deeply frustrated by things. We need this epic adventure sorting please, can we discuss with yourselves and or the science officer on the case please?

I've had full PMNs sorted much quicker, which should not be the case here. This whole saga is 12 months in, for a low volume, non-hazardous, low exposure, 100% combusted, marker substance.

Regards Ian

Head of Global Regulatory Compliance
Innospec Limited

From: Yang, Chun-Chieh <Yang.Chun-Chieh@epa.gov>
Sent: 20 February 2020 16:06
To: Kyleigh Gloska <Kyleigh.Gloska@innospecinc.com>
Cc: Ian Callan <Ian.Callan@innospecinc.com>; James Dawick <James.Dawick@innospecinc.com>
Subject: RE: [External] LVE L-19-0182

Hi,

Just let you know that by the latest processing flow, I will receive the correct engineering report by next Tuesday. As soon as I receive the report, I will send it to you immediately.

By the way, probably the NPDES or more details for processing sites would be very helpful to reduce or eliminate water release since some are unknown in the report.

Thank you for your patience.


Chun-Chieh Yang
Biologist / Physical Scientist
6128H, WJC-East
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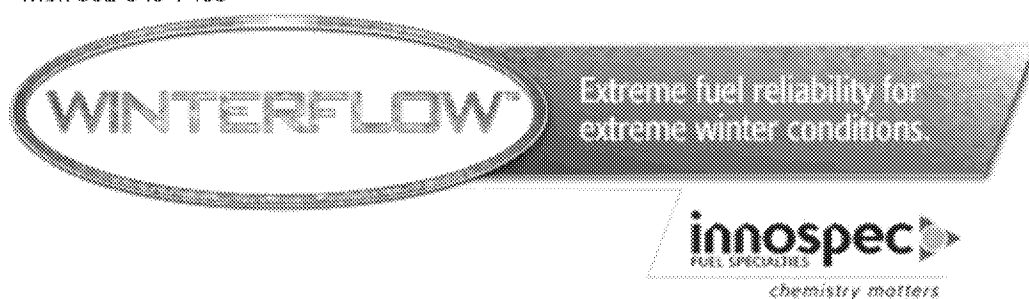
From: Kyleigh Gloska <Kyleigh.Gloska@innospecinc.com>
Sent: Thursday, February 20, 2020 9:46 AM
To: Yang, Chun-Chieh <Yang.Chun-Chieh@epa.gov>
Cc: Ian Callan <Ian.Callan@innospecinc.com>; James Dawick <James.Dawick@innospecinc.com>
Subject: LVE L-19-0182

Chun,

As we discussed on the phone, can you please fax over the engineering report for LVE L-19-0182 today.
The fax number is 1-302-451-1380.

Kind Regards,

 Kyleigh K. Gloska
Product Regulatory Manager
Innospec Fuel Specialties LLC
200 Executive Drive
Newark, DE 19702
Of: 302-451-1362
Fax: 302-451-1380
Mbl: 302-345-7483



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